

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re No. 13-53846
CITY OF DETROIT, MICHIGAN, Chapter 9
Debtor. HON. STEVEN W. RHODES

ATTACHMENT

**APPELLEE STATE OF MICHIGAN'S DESIGNATION OF ITEMS
TO BE INCLUDED IN THE RECORD ON APPEAL**

Design- ation	Docket #	Filing Date	Description
3.	486	8/19/2013	Joinder of Local 517M, Service Employees International Union as interested party to Objections to Detroit's Eligibility for Relief Under Sections 109(c) and 921(c) of the Bankruptcy Code

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

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 In re: : Chapter 9
 :
 CITY OF DETROIT, MICHIGAN, : Case No.: 13-53846
 :
 Debtor. : Hon. Steven W. Rhodes
 ----- x

**JOINDER OF LOCAL 517M, SERVICE EMPLOYEES INTERNATIONAL UNION AS
INTERESTEDED PARTY TO OBJECTIONS TO DETROIT'S ELIGIBILITY FOR
RELIEF UNDER SECTIONS 109(c) AND 921(c) OF THE BANKRUPTCY CODE**

Local 517M, Service Employees International Union (“Local 517M”) hereby joins and objects to the City of Detroit’s eligibility for an order or relief under chapter 9 of the U.S. Bankruptcy Code and adopts by reference hereto the arguments contained in, and documents appended to, the Objections To the City of Detroit’s Eligibility for an Order for Relief Under Sections 109(c) and 921(c) of the Bankruptcy Code filed by International Union, United Automobile, Aerospace and Agricultural Implement Workers of America (“UAW”) and the Objection filed by Counsel 25, American Federation of State, City, and Municipal Employees (“AFSCME”). In support of this joinder, Local 517M states the following:

1. Local 517M is a labor organization headquartered in Lansing, Michigan and represents approximately thirty-nine (39) City of Detroit employees in various departments and positions.

2. Over the past year, Local 517M has joined with other labor organizations representing the City of Detroit employees to press for solutions that reflect fair and democratic participation by the City’s stakeholders. During the prepetition period, the City consistently and



continuously refused to engage in any bargaining with representatives of Local 517M, and presented its proposals only on “take it or leave it” basis.

3. As an interested party, Local 517M reserves the right to be heard during any argument or status conference concerning the City’s eligibility for bankruptcy relief and all other related matters.

WHEREFORE, for the foregoing reasons, Local 517M joins in UAW’s and AFSCME’s Objections and requests that the City of Detroit’s Chapter 9 Petition be dismissed.

Respectfully submitted,

SACHS WALDMAN, P.C.

/s/ Andrew Nickelhoff

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Dated: August 19, 2013

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

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CERTIFICATE OF SERVICE

I, Mami Kato, being first duly sworn, hereby certify that on August 19, 2013, I electronically filed **Joinder of Local 517M, Service Employees International Union as Interested Party to Objections to Detroit's Eligibility for Relief Under Sections 109(c) and 921(c) of the Bankruptcy Code** and this **Certificate of Service** with the Clerk of the Court through the Court's CM/ECF system which will provide notice and service of such documents upon the parties through counsel of record.

SACHS WALDMAN, P.C.

/s/ Mami Kato
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Date: August 19, 2013